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22
23 UNITED STATES DISTRICT COURT
24
25 NORTHERN DISTRICT OF CALIFORNIA
26
27 SAN FRANCISCO DIVISION

28 EPIDEMIC SOUND, AB,

Plaintiff,

vs.

META PLATFORMS, INC., f/k/a FACEBOOK,
INC.,

Defendant.

CASE NO. 3:22-cv-04223-JSC

**PLAINTIFF EPIDEMIC SOUND, AB'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER TO FILE
UNDER SEAL NEWLY PRODUCED
DOCUMENTS IN SUPPORT OF
EPIDEMIC SOUND, AB'S SEPTEMBER
25, 2024 JOINT DISCOVERY DISPUTE
CONCERNING RIGHTS MANAGER
DATA**

The Honorable Jacqueline Scott Corley

1 Pursuant to Local Rules 7-11 and 79-5(f), Plaintiff Epidemic Sound, AB (“Epidemic”)
2 respectfully moves for an order to consider whether to seal the accompanying evidence supporting
3 Epidemic’s September 25, 2024 joint discovery dispute concerning Defendant Meta Platform
4 Inc.’s (“Meta”) refusal to produce the requested Rights Manager data export (the “Joint Dispute”),
5 which documents were not produced by Meta until September 30, 2024 and which Meta has
6 designated as “Confidential” under the Protective Order in this action (Dkt. 74). Epidemic has
7 reviewed and complied with section E of the Court’s February 17, 2023 Civil Standing Order and
8 has reviewed and complied with Local Rule 79-5.

9 The reasons and bases for considering the sealing of the materials identified below are set
10 forth in the accompanying Declaration of M. Mona Simonian In Support Of Epidemic’s
11 Administrative Motion To File Under Seal (“Simonian Declaration”). Epidemic requests that the
12 following material be considered to be filed under seal:

13	Document	Designating Party
14	Simonian Declaration, Page 1, Lines 20-24; Page 2, Lines 15 1-2.	Meta
16	Simonian Declaration, Exhibit 1 17 (META-EPDMS_00188110-12 and 00188113)	Meta

18 While Epidemic takes no position with regard to the propriety of Meta’s designation of
19 confidentiality, Meta has designated the documents identified above as “Confidential” to Meta.
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21 This motion is accompanied by the Simonian Declaration attaching the exhibits to be
22 considered for sealing and a Proposed Order.
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Dated: October 2, 2024

Respectfully submitted,
PRYOR CASHMAN LLP

By: Mona Simonian
M. Mona Simonian

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Attorneys for Plaintiff Epidemic Sound, AB

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Date: October 2, 2024

/s/ Adam S. Cashman
Adam S. Cashman